

# **EXHIBIT E**



**From:** Yovanic, Jr., Paul J PYovanic@seyfarth.com  
**Subject:** RE: Wordlaw v. Enterprise - 20-cv-03200 - Plf's Draft JSR Due Today  
**Date:** October 25, 2021 at 5:01 PM  
**To:** Brendan Duffner bduffner@mcgpc.com, Timothy Kingsbury tkingsbury@mcgpc.com  
**Cc:** Dixon, Brandon L. bdixon@seyfarth.com, Cockcroft, Andrew R. ACockcroft@seyfarth.com

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Hi Brendan:

Thank you for your email. I can assure you that we have been working diligently on this and we can provide the following update.

We have made significant progress on obtaining signed consent forms for putative class members. Our client has been able to retrieve signed forms for current employees. Among the current employees, we compiled signed consent forms for all of them, except for a few we are trying to run down.

With respect to former employees, tracking down their consent proved to be a cumbersome process due to several technical issues related to the exit process. Across all Enterprise locations, there are over 4,000 former employees since 2016. However, as we have discussed previously, not every Enterprise location in Illinois utilized the timekeeping system at issue. As a result, we needed to develop a strategy to cull that data to something manageable, and then retrieve the personnel files from the smaller, relevant pool of former employees.

We managed to streamline the pool of former employees, and we are now at the stage of looking through those personnel files and pulling the consent forms. Many of the personnel files are housed in offsite storage facilities, which the client was unable to obtain until last week. Our client anticipates completing the review of those files by the end of the month, if not earlier.

We remain committed to getting you information by the end of the month, as promised. As you can see, we have been working diligently to compile the necessary information to support our position and help you evaluate potential class issues. Please let us know if you would like to set up a call next week to figure out what makes most sense in terms of production of information for current employees, and to discuss any questions you may have about the collection process.

We thank you again for your patience while we sort through the information.

Best,

Paul

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**From:** Brendan Duffner <bduffner@mcgpc.com>  
**Sent:** Monday, October 25, 2021 3:47 PM  
**To:** Timothy Kingsbury <tkingsbury@mcgpc.com>  
**Cc:** Yovanic, Jr., Paul J <PYovanic@seyfarth.com>; Ahlering, Thomas E. <TAhlering@seyfarth.com>; Dixon, Brandon L. <bdixon@seyfarth.com>  
**Subject:** Re: Wordlaw v. Enterprise - 20-cv-03200 - Plf's Draft JSR Due Today

**[EXT. Sender]**

Paul,

Please advise regarding the status of Defendants' production of documents, as we are beyond the production date identified in the Parties' September 30th Joint Status Report.

Thanks,

Brendan

**Brendan Duffner** | Attorney  
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